

Gregory Reilly  
LITTLER MENDELSON  
A Professional Corporation  
Attorneys for Plaintiff  
885 Third Avenue, 16<sup>th</sup> Floor  
New York, New York 10022  
(212) 583-9600

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND  
MANAGEMENT COMPANY, AIMCO  
PROPERTIES, L.P., NHP MANAGEMENT,  
and AIMCO/BETHESDA HOLDINGS, INC.,

## Defendants.

Case No. 07 Civ. 6435

**NOTICE OF CONSENT MOTION  
FOR  
ADMISSION *PRO HAC VICE***

PLEASE TAKE NOTICE that on October 22, 2007, or as soon thereafter as counsel may be heard, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, the undersigned, counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc., shall move before the Honorable Laura Taylor Swain, at the United States District Court House located at 500 Pearl Street, New York, New York 10007, for the entry of an Order admitting John M. Husband as co-counsel *pro hac vice* for all purposes in the above-captioned matter.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, counsel for Defendants shall rely on the accompanying Certification of Gregory Reilly, attached hereto as **Exhibit A** and John M. Husband, attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that Plaintiffs have no objections to this Motion.

PLEASE TAKE FURTHER NOTICE that the issues raised in this Motion do not require the submission of a brief to the Court.

Dated: October 22, 2007.

Respectfully submitted,

LITTLER MENDELSON  
A Professional Corporation

By: \_\_\_\_\_

Gregory Reilly (GBR-6189)  
885 Third Avenue, 16<sup>th</sup> Floor  
New York, New York 10022  
(212) 583-9600

**ATTORNEYS FOR DEFENDANTS**

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND  
MANAGEMENT COMPANY, AIMCO  
PROPERTIES, L.P., NHP MANAGEMENT,  
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**CERTIFICATION OF  
GREGORY REILLY IN SUPPORT  
OF MOTION FOR ADMISSION  
*PRO HAC VICE***

Gregory Reilly, of full age, certifies as follows:

1. I am a shareholder of the law firm of Littler Mendelson P.C., counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. ("AIMCO") in the above-captioned matter, and I am familiar with the facts set forth in this Certification.

2. I am an attorney in good standing of the Bar of the State of New York. My office is located at 885 Third Avenue, 16<sup>th</sup> Floor, New York, New York 10022. I am admitted to practice before the United States District Court for the Southern District of New York. I have never been the subject of any disciplinary sanction as member of the Bar in any jurisdiction.

3. As stated in the accompanying Certification of John M. Husband, Mr. Husband is partner with the firm Holland & Hart LLP, and is a member in good standing of the Bar of the State of Colorado. He also is admitted to practice before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the

EXHIBIT

A

4. In accordance with Local Civil Rule 1.3(c), I shall act as counsel of record for purposes of this litigation and accept service of all notices, orders and pleadings along with Mr. Hazard. I also shall be responsible for the conduct of Mr. Hazard should the Court grant this Motion.

5. Plaintiffs' counsel have been fully apprised regarding this Motion and have consented to the granting thereof.

6. I respectfully request that this Court grant this Motion admitting Thomas E.J. Hazard, *pro hac vice*, for all purposes as co-counsel on behalf of the Defendants in all stages of the above-captioned matter.

7. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

By: \_\_\_\_\_  
Gregory Reilly

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND  
MANAGEMENT COMPANY, AIMCO  
PROPERTIES, L.P., NHP MANAGEMENT,  
and AIMCO/BETHESDA HOLDINGS, INC.,

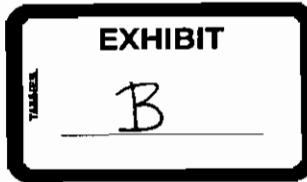
Defendants.

Case No. 07 Civ. 6435

**CERTIFICATION OF  
JOHN M. HUSBAND IN SUPPORT  
OF MOTION FOR ADMISSION  
*PRO HAC VICE***

John M. Husband, of full age, certifies as follows:

1. I am a partner of the law firm of Holland & Hart, LLP, co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned matter, and I am familiar with the facts set forth in this Certification.
2. I am an attorney-at-law and a member in good standing of the Bar of the State of Colorado. My office is located at 555 17<sup>th</sup> Street, Suite 3200, Denver, Colorado 80202. I am admitted to practice before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the District of Columbia Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Ninth Circuit, and United States Court of Appeals for the Eighth Circuit. I have never been the subject of any disciplinary sanction as member of the Bar in any jurisdiction.



3. I submit this Certification in support of my application to appear before this Court *pro hac vice* as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned case.

4. This case involves unique federal wage and hour issues. I have specialized in the field of labor and employment law and my practice is limited primarily to this area of law.

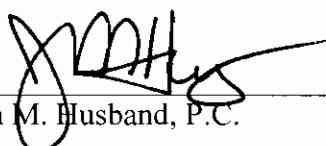
5. If admitted to practice before the Court *pro hac vice*, I will abide by the requirements of the rules of this Court. I will also be available for court conferences, motion dates, and trial dates.

6. Accordingly, it is respectfully requested that this Court grant this Motion to appear *pro hac vice* and enter an Order permitting me to appear and participate as co-counsel in the above-captioned case.

7. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

By:



John M. Husband, P.C.

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# Certificate of Good Standing

United States District Court  
District of Colorado

I, Gregory C. Langham, Clerk of the United States District Court  
DO HEREBY CERTIFY  
**JOHN M. HUSBAND**  
was duly admitted to practice in said court on  
**October 4, 1978**  
and is in good standing as a member of the bar of said court.

Dated: October 18, 2007

Gregory C. Langham, Clerk

By: Mark J. Finkin  
Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND  
MANAGEMENT COMPANY, AIMCO  
PROPERTIES, L.P., NHP MANAGEMENT,  
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**CERTIFICATE OF SERVICE**

Gregory Reilly, of full age, certifies as follows:

1. I am an attorney-at-law duly admitted to practice in this Court, and a member of the law firm of Littler Mendelson, P.C., counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. in the above-captioned matter. I am familiar with the facts set forth in this Certification.

2. I caused a true and correct copy of Defendants' Notice of Motion for Admission *Pro Hac Vice*, along with the accompanying Certifications of Gregory Reilly and John M. Husband to be served upon the following *via* hand delivery this 22<sup>nd</sup> day of October 2007:

Steig Olson  
Cohen Milstein Hausfeld & Toll PLLC  
152 East 52<sup>nd</sup> St., 13<sup>th</sup> Floor  
New York, NY 10022  
[solson@cmht.com](mailto:solson@cmht.com)

Joseph M. Sellers  
Charles E. Thompkins  
Llezlie L. Green  
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1100 New York Ave NW  
West Tower, Suite 500  
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[cthompkins@cmht.com](mailto:cthompkins@cmht.com)  
[lgreen@cmht.com](mailto:lgreen@cmht.com)

3. I hereby certify that the foregoing statements made by me are true and to the best of my knowledge. I understand that if any of the foregoing is willfully false, I am subject to punishment.

Dated: October 22, 2007.

LITTLER MENDELSON  
A Professional Corporation

By: \_\_\_\_\_

Gregory Reilly (GBR-6189)  
885 Third Avenue, 16<sup>th</sup> Floor  
New York, New York 10022  
(212) 583-9600

**ATTORNEYS FOR DEFENDANTS**

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

GALLOWAY, et al.,

Plaintiffs,

-against-

APARTMENT INVESTMENT AND  
MANAGEMENT COMPANY, AIMCO  
PROPERTIES, L.P., NHP MANAGEMENT,  
and AIMCO/BETHESDA HOLDINGS, INC.,

Defendants.

Case No. 07 Civ. 6435

**ORDER GRANTING  
ADMISSION *PRO HAC VICE*  
(ON CONSENT)**

This matter having come before the Court on the Motion of Gregory Reilly, a member in good standing of the bar of this Court, for leave to permit John M. Husband, Esq. to appear in this action *pro hac vice*, as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc., and the Court being sufficiently advised that John M. Husband, Esq. is licensed and admitted to practice law for the State Bar of Colorado and before the United States Supreme Court, United States District Court for the District of Colorado, United States Court of Appeals for the District of Columbia Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Ninth Circuit, and United States Court of Appeals for the Eighth Circuit, it hereby **GRANTS** said motion; and

IT IS HEREBY ORDERED that John M. Husband is granted leave to appear in this action *pro hac vice*, as co-counsel for Defendants Apartment Investment and Management Company, AIMCO Properties, L.P., NHP Management, and AIMCO/Bethesda Holdings, Inc. on consent.

Dated: \_\_\_\_\_, 2007

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United States District Judge

Order Granting Admission Pro Hac Vice - Husband.doc